

K&L GATES

July 24, 2024

**By ECF**

The Honorable Gregory H. Woods  
United States District Court  
for the Southern District of New York  
Daniel Patrick Moynihan United States  
Courthouse  
500 Pearl Street, Room 2260  
New York, NY 10007

**Re: USA v. Kostin, et al., Case No. 24-cr-00091-GHW**

Dear Judge Woods:

I write to request a modification of Defendant Vadim Wolfson's conditions of pretrial release to allow him to relocate for business purposes to Los Angeles, California, with supervision transferred to the Central District of California.

Currently, Mr. Wolfson is monitored by Pretrial Services in the Western District of Texas but is permitted to travel to the Central District of California as needed for business. *See* ECF No. 31. Mr. Wolfson is successfully pursuing business opportunities in Los Angeles that require his personal supervision. As a result, rather than traveling on a frequent basis between the Western District of Texas and the Central District of California, he seeks leave to relocate to the Central District of California, with permission to travel as needed to the Southern and Eastern Districts of New York for court appearances and to the Western District of Texas, where he will continue to own property.

Francesca Piperato of Pretrial Services has confirmed that Pretrial Services does not oppose this request. AUSA Emily Deininger has expressed that the prosecution team defers to Pretrial Services.

Respectfully submitted,

/s/ David Rybicki

David Rybicki

CC: Francesca Piperato (via email)